

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COMMON CAUSE, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of Georgia, et al.,

Defendants.

Case No. 1:22-CV-0090-
SCJ-SDG-ELB

STATUS REPORT

Pursuant to this Court’s order dated January 6, 2022, Plaintiffs Common Cause, League of Women Voters of Georgia, Dr. Ursula Thomas, Jasmine Bowles, and Dr. H. Benjamin Williams (“Common Cause”) hereby submit the following Status Report.

1. Consolidation

Common Cause has met and conferred with the other Plaintiffs covered by this Court’s order as well as Defendant Raffensperger. Due to the factual, legal, and procedural similarity of Common Cause’s and the Georgia State Conference of the NAACP’s (“NAACP”) constitutional challenges, Common Cause and the NAACP agree that their constitutional claims can and should be consolidated before a three-judge panel for purposes of conducting all proceedings, including discovery and hearings in connection with any request(s) for preliminary injunctive relief.

Although there is some factual overlap with the Section 2 claims, those claims do not share common legal, procedural, or jurisdictional issues and therefore consolidation with those claims is inappropriate. Common Cause will of course endeavor to coordinate discovery to the extent feasible.

2. Scheduling

Common Cause has met and conferred with Defendant Raffensperger and all plaintiffs covered by this Order with respect to scheduling. Common Cause's proposed scheduling is consistent with that of the NAACP:

Deadline for amendments to complaints	March 30, 2022
Deadline to complete fact discovery	November 23, 2022
Deadline for filing expert reports	December 23, 2023
Deadline for rebuttal expert reports	January 23, 2023
Deadline to complete expert discovery	February 17, 2023
Deadline to file dispositive motions	March 10, 2023
Deadline to file oppositions to dispositive motions	April 10, 2023
Deadline to file replies in support of dispositive motions	April 17, 2023
Deadline to file pretrial stipulations, exhibits, witness lists	20 days before trial date
Deadline for filing of <i>Daubert</i> and in limine motions	15 days before trial date
Trial date	To be set by the Court

3. Preliminary Injunctive Relief

At this time, Common Cause is not seeking preliminary injunctive relief and does not have a proposed schedule for the same.

Dated this 11th day of January
2022.

Respectfully submitted,

/s/ Jack Gengberg

Jack Gengberg (Ga. Bar 144076)
jack.gengberg@splcenter.org
Pichaya Poy Winichakul (Ga. Bar 246858)
poy.winichakul@splcenter.org
SOUTHERN POVERTY LAW CENTER
P.O. Box 1287
Decatur, GA 30031-1287
Telephone: (404) 521-6700
Facsimile: (404) 221-5857

Neil Steiner*
neil.steiner@dechert.com
Sharon Turret*
sharon.turret@dechert.com
DECHERT LLP
Three Bryant Park, 1095 Avenue of the
Americas
New York, NY 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599

Hartley M.K. West*
hartley.west@dechert.com
DECHERT LLP
One Bush Street, Suite 1600
San Francisco, CA 94104-4446

Telephone: (415) 262-4500
Facsimile: (415) 262-4555

Kyle DeCamp*
kyle.decamp@dechert.com
DECHERT LLP
633 West 5th Street, Suite 4900
Los Angeles, CA 90071-2032
Telephone: (213) 808-5700
Facsimile: (213) 808-5760

Attorneys for Plaintiffs
*Pro Hac Vice Forthcoming

CERTIFICATE OF COMPLIANCE AND OF SERVICE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **STATUS REPORT** has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(c), and that I provided notice and copy of the foregoing using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

/s/ Jack Genberg

Jack Genberg (Ga. Bar 144076)